

EXHIBIT B

Complaint to Trans Union, LLC

DR 09/06/2013 (00VC36) 98.59393.6088953

Cynthia Hughes

1706 Coral Path Wall NJ 07719

732-966-0762

Superior Court of New Jersey

Law Division Monmouth County

Docket No:

Cynthia Hughes

Plaintiff

Vs.

**CIVIL ACTION
Complaint**

Verizon Wireless,

Capital One,

Capital One Auto Finance,

Trans Union,

Experian,

Equifax

Defendants

Plaintiff Cynthia Hughes residing at 1706 Coral Path Wall NJ 07719 in the County of Monmouth states as follows;

1). I had 2 accounts with Verizon Wireless. The first account was opened on or around 2009 and I regretfully allowed the account to go to a collection status. The second account was opened on or around November 2011. I maintained the account and around spring 2012 I was having serious financial trouble, however I still was managing to maintain the accounts. In July 2012 I took a leave of absence from work as my mother was moved into hospice and was dying. When she passed at the end of that month I was in such a devastated state I could not return to work and took another month off. I called Verizon and they did try to work with me. I tried to keep the account current but then Hurricane Sandy happened and I was out of work again. My financial troubles just kept growing and growing and unfortunately I was turned over to collections. They have these accounts listed on all 3 credit reporting agencies as a collection action. Both of these accounts have been paid in full and the accounts have been satisfied and closed. Yet they remain as a negative entry on my credit files. I have written and called Verizon and asked them to please simply remove the word "COLLECTION" and list them as paid in full or satisfied. They refuse to do this after numerous requests. Around June 21, 2013 I wrote to Verizon at two different addresses and explained of my hardships, I begged and pleaded with them to please update my files. In mid to late July of 2013 my husband received a phone call on his cell phone despite the fact that I included my cell phone number in my letter to them the earlier month. When I called back

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I got a gentleman on the phone who said that he saw in the account notes that the credit files were updated and I would see the change by August 1, 2013. It is now August 27, 2013 and my credit still remains affected by the word "COLLECTION". Because of the actions of Verizon Wireless I have suffered damages including but not limited to denial of credit, inability to secure bank loans, denial of credit cards, consolidation loans and the like. Due to the aforementioned damages I have been unable to provide and secure a future for my family.

2.) In February 2013 I was late paying some of my bills. I was again facing another major change and hardship. I had just buried my mother 6 months earlier and trying to manage my devastation only to be blindsided again by CANCER. My father was diagnosed with advanced stages of cancer and was losing his fight very fast. From February 2013 to June 2013 I again took some time from work to care for my dad and try to prepare for his death which came on May 7, 2013. I wrote to Capital One in particular on June 21, 2013 to explain I was experiencing a great deal of stress and would they please take into consideration that I had good paying history and remove the late pay from my credit file. They wrote me back and said that the late pay met the fair credit rules/regulations and that was it. It seemed as if my request fell on deaf ears or was not even taken into consideration. I asked for consideration because I was a good customer and had not been 30 days late before. They have refused to assist me. Because of these actions I have suffered damages including but not limited to denial of credit inability to secure bank loans, denial of credit cards, consolidation loans and the like. Due to the aforementioned damages I have been unable provide and secure a future for my family.

3.) On May 31, 2013 I traded in my 2009 Hyundai Sonata. That same day I leased a new vehicle. On or around June 2013 Capital One Auto Finance was calling me for payment. I explained I no longer owned the car and they should contact the dealership. I gave them the dealership contact information. However collection calls were still coming from Capital One Auto Finance and I continued to explain to them I no longer owned the car. They were insisting that they had not received the pay off check from the dealership. This prompted me to go back to the dealership on or around July 5, 2013 to inquire if they had in fact sent the pay off check. The dealership assured me that they took care of it. But again I was still receiving calls from Capital One Auto Finance, so back to the dealership I went. They called Capital One only to be told that they had no record of receiving a check from the dealership, so the dealership then sent over-night another check. But again I started getting calls from Capital One Auto Finance a week later. By this point I had enough of this craziness for I was already under a great deal of stress. I called the dealership and they did a conference call with Cap One and myself and I heard Cap One state that they had lost the 2 checks that dealership sent in. The dealership was sending a 3rd check now at this point by way of phone. However by this point the damage was done to my credit. I have disputed this to not only the 3 credit reporting agencies but to Capital One Auto Finance and yet to date I am showing a late pay for this car loan for months that I did not own the car any longer. Because of Capital One's irresponsibility and their error my credit has been further compromised. This is showing future credit lenders that I am irresponsible and a risk. Because of the actions of Capital One Auto Finance I have suffered damages including but not limited to denial of credit inability to secure bank loans, denial of credit cards, consolidation loans and the like. Due to the aforementioned damages I have been unable provide and secure a future for my family.

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4.) In or around 2010 I decided to inquire on my credit worthiness and score. I discovered I had some inaccuracies and started writing letters to the three major credit reporting agencies. I was successful in fixing name and address errors as well as some inaccurate information on a few collection accounts. In addition to that I paid off the collection accounts. As I fixed some of these items in my file my score and credit worthiness was improving which was allowing me to re-establish. I have been successful in opening a few charge accounts and securing a car loan. However there are still some negative items that remain and are causing me great hardship in trying to continue to build credit worthiness. I have applied for bank loans, consolidation loans, FEMA loans, major credit cards only to be denied due to the negative accounts that remain. I have written to Experian, Equifax and Trans Union and begged and pleaded to please take my circumstances into consideration. I have asked them to please remove my nine year old discharged bankruptcy and only Trans Union refuses to do so. I have provided divorce papers, restraining order documents, legal papers showing that during my 14 year marriage to Robert Bodtmann my children and I were under great distress. I have sent many letters over the course of 2 plus years asking them to please help me and give me consideration due to the fact that I had been re-establishing and showing good paying history with my current accounts. However they refuse to take any of my circumstances into consideration. Some of my letters are nothing short of begging and pleading. I am desperately trying to buy a home and have lower interest rates on my current credit cards and loans. I am trying to secure a major credit card and consolidate the smaller accounts I have currently. In July 2013 my daughters were denied PELL grants from the Federal Government due to my new marriage. They had to file for financial aid. After consulting with the financial aid officer I had asked what would be our options if they were denied. She said a student loan from a bank. I was sweating bullets because I knew I would be denied and my children would not be able to go to school. This is causing me great distress and because of these actions I have suffered damages including but not limited to denial of credit, inability to secure bank loans, denial of credit cards, consolidation loans and the like. Due to the aforementioned damages I have been unable provide and secure a future for my family.

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1). The defendant(s) in this action resides as follows;

1. Verizon Wireless : PO BOX 408 NEWARK, N.J 07101-0408
2. Capital One : PO Box 30285 Salt Lake City, UT 84130-0285
3. Capital One Auto Finance: 3905 N. Dallas Pkwy Plano, TX 75093
4. Trans Union : P.O. Box 2000 Chester, PA 19022-2000
5. Equifax : P.O. Box 740241 Atlanta, GA 30374
6. Experian : 4 Gatehall Drive 3rd Floor Parsippany, NJ 07054

2). Plaintiff is entitled to relief from defendant under the above facts

3). The harm that occurred as a result of defendant's acts include:

I Cynthia Hughes have suffered great financial hardship due to the actions of the parties named in this complaint. I am unable to obtain and provide proper financial means to help my financial burdens and family. I have asked for help on several occasions of the parties named in this complaint and have been refused. The actions of these parties named in this complaint have caused me not only additional financial hardships but great stress due to the difficulty in trying to further fix my financial issues. I cannot secure any type of loan or major credit card or even lower interest rates on the current loans and credit cards I posses currently. I have asked, begged and pleaded with these companies to take all of my circumstances into consideration. I have provided them information showing serious acts of domestic violence upon myself and children which resulted in some of my poor financial decisions over the years. I have also provided that despite the years of abuse I suffered I still managed to turn my financial issues around in my favor and have been very responsible since such time. I feel if I had outstanding debt due and serious delinquencies in my credit file I would not have the right to ask these parties to help me nor ask the court to now become involved. I have proven myself worthy of their assistance and trust. I have never denied that I made mistakes in my past nor have I denied any item that I have disputed. These parties' replies only prove that they do not read what I have been asking and have not given any consideration to my requests.

I have serious bills piling up and have been desperately trying to secure any loans to pay off or consolidate my debt and have been refused from every borrower I have gone to. Reasons are because of serious negative entries, bankruptcy, high balances on current accounts and low credit score.

Because of my inability to consolidate my debt this has had profound consequences for my four children as well. My children's ages range from 16 to 24 and they are forced to assist me with some of the bills and the grocery shopping. I am unable to provide allowances or monies for their extracurricular activities. They are suffering if not more because of my financial burdens. I receive no child support for my children, from there estranged father, and this makes it even harder to provide to my children what they not only need but desire.

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I Cynthia Hughes am seeking the following:

- 1. My credit files are updated to a positive status and the "WORDS" collection, charge-off, delinquent, seriously past due, and the like be removed from any accounts that NO MONIES are due.**
- 2. That Trans Union removes the bankruptcy entry.**
- 3. That Verizon Wireless compensates me in the amount of \$ 10,000 dollars for damages and instructs the credit reporting agencies to update my credit files to a positive status.**
- 4. That the three major credit reporting agencies named in this complaint compensate me in the amount of \$25,000 dollars each for damages to total \$75,000.**
- 5. That Capital One credit removes the "LATE" entry from February due to my hardships at that time.**
- 6. That Capital One Auto Finance removes any late pay in my file and restores the credit entry to a positive status as well as removes any negative feedback with regard to this account. In addition I am seeking financial damages in the amount of \$3,000 which is the sum of seven car payments on my current loan.**

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MONMOUTH COUNTY
SUPERIOR COURT
PO BOX 1263
FREEHOLD NJ 07728
COURT TELEPHONE NO. (732) 677-4240
COURT HOURS

TRACK ASSIGNMENT NOTICE

DATE: AUGUST 29, 2013
RE: HUGHES VS VERIZON WIRELESS ETALS
DOCKET: MON L -003336 13

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 1.

DISCOVERY IS 150 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON KATIE A. GUMMER

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (732) 677-4262 EXT 4262.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING. PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE WITH R.4:5A-2.

ATTENTION:

CYNTHIA HUGHES
1706 CORAL PATH
WALL NJ 07719

JUNNAND

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Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

Dated 8/27/13

Signature C. H. [Signature]

CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated 8/27/13

Signature C. H. [Signature]